

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
THE REPUBLIC OF KAZAKHSTAN,	:	
	:	
Plaintiff,	:	
	:	15 Civ. 1900 (ER)
-against-	:	
	:	<u>PROTECTIVE ORDER</u>
DOES 1-100 INCLUSIVE,	:	
	:	
Defendants.	:	
-----	X	

WHEREAS by Order dated October 28, 2015, the Court granted Plaintiff's motion for the issuance of Letters Rogatory (the "Letters Rogatory") to the High Court of New Zealand for assistance in obtaining evidence from Mega Limited ("Mega"), a company registered in New Zealand, and

WHEREAS, Plaintiff has moved for issuance of a protective order governing any documents, materials or information produced by Mega pursuant to the Letters Rogatory ("Mega Production");

NOW THEREFORE, it is hereby ORDERED that Plaintiff, its representatives, agents, attorneys, experts, and consultants, shall adhere to the following terms:

1) Only the individuals described in the below subparagraphs shall have access to the Mega Production or any portion thereof:

(a) Plaintiff's outside litigation counsel ("Litigation Counsel"), including any paralegal, clerical and/or other assistant employed by and assisting such Litigation Counsel in this matter;

(b) any person (not an employee of Plaintiff) who is retained by Litigation Counsel to serve as an expert witness or consultant, provided such person has first executed a Non-Disclosure Agreement in the form annexed as Exhibit 1 hereto;

(c) independent photocopying, graphic production services, or litigation support services employed by Litigation Counsel to assist in this action, and computer service personnel (not employees of Plaintiff) performing duties in relation to a computerized litigation system;

(d) this Court and its support personnel; and

(e) any other person whom Mega agrees in writing may have access to such Mega Production.

2) Prior to any disclosure of any Mega Production to any person referred to in subparagraph 1(b) above, such person shall be provided by counsel with a copy of this Protective Order and shall sign a Non-Disclosure Agreement in the form annexed as an Exhibit A hereto stating that the person has read this Order and agrees to be bound by its terms.

3) All Mega Production filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose any of the Mega Production, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court.

4) This Order is governed by, interpreted under, and construed and enforced in accordance with New York law, without regard to the conflict of law principles of the State of New York. Any dispute regarding this Order shall be resolved by making an appropriate application to this Court in accordance with its rules.

5) This Order may not be modified except with the permission of this Court.

6) This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder.

It is so ORDERED.

Dated: New York, New York
January ____, 2016

UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
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THE REPUBLIC OF KAZAKHSTAN,	:	
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Plaintiff,	:	
	:	15 Civ. 1900 (ER)
-against-	:	EXHIBIT 1: PROTECTIVE ORDER
	:	
DOES 1-100 INCLUSIVE,	:	
	:	
Defendants.	:	
-----	X	

I, _____, acknowledge that I have read and understand the Protective Order in this action. I agree that I will use Mega Production solely for the prosecution or defense of this action and for no other purpose and that at the conclusion of the litigation I will return all Mega Production I have received to the attorney from whom I received it. In addition, I agree that I will not disclose Mega Production except as authorized by the Protective Order. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

DATED: _____ [NAME]